

EXHIBIT "1"

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In Re:	§	
	§	
CINCH WIRELINE SERVICES, LLC	§	Case No. 23-51742-cag
	§	
	§	
Debtor.	§	Chapter 7

**SUPPLEMENTAL DECLARATION OF ERNEST "BUTCH" BOYD PURSUANT TO
RULES 2014 AND 2016 OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE**

Ernest "Butch" Boyd, a shareholder of Butch Boyd Law Firm, P.C., makes this Supplemental Declaration pursuant to 28 U.S.C. § 1746 and hereby certifies and verifies as follows in support of the *Supplement and Clarification of Application for Retention of Jordan & Ortiz, PC as Counsel for the Trustee Pursuant to 11 U.S.C. § 327(a)* (the "Application"):

1. I am a Shareholder of Butch Boyd Law Firm, P.C. ("BBLF") a law firm which maintains offices for the practice of law at 2905 Sackett St. Houston, Texas 77098 and I make this declaration with personal knowledge of the facts set out herein and under penalty of perjury.

2. I am an attorney-at-law, duly admitted and in good standing to practice in the State of Texas, each Federal Court for the Southern, Eastern, Western and Northern Districts of Texas. I am familiar with the Rules of Procedure for the Bankruptcy Courts of the Western District of Texas and the Court Procedures for the Bankruptcy Court San Antonio Division. There are no disciplinary proceedings pending against me.

3. I make this verified statement in support of the Application filed on behalf of John Patrick Lowe, Chapter 11 Trustee (the "Trustee") to employ BBLF as "SPECIAL COUNSEL" in

EXHIBIT "1"

this Chapter 7 case under 11 U.S.C. § 327(e) of the Bankruptcy Code and Rules 2014(a) and 2016(b) of the Federal Bankruptcy Rules of Procedure. Except as otherwise set forth herein, all facts set forth in this statement are based upon my personal knowledge, upon client/matter records of BBLF reviewed by myself and staff or derived from information available to me which I believe to be true and correct.

4. The BBLF shareholders, along with the law firm of Jordan & Ortiz, that will make up the team representing the Trustee in the role as Special Counsel and have long-standing experience serving as counsel in bankruptcy cases, complex, commercial litigation matters, and debtor-creditor matters, and are well-qualified to represent the Trustee as Special Counsel in this case.

5. Other than as set forth herein, neither I, nor BBLF, nor any of its shareholders to the best of my knowledge, have any connection with the Debtor, their respective attorneys and accountants, United States Trustee, or any person employed in the office of the United States Trustee. BBLF does represent creditor, Mary Kay McGuffin, who has been fully apprised of the proposed representation of the Estate by BBLF and she has consented to this representation. Disclosure of any future connection, if any, will be made to the Court. BBLF has no known connections to the Trustee.

6. Neither I, nor BBLF, nor any of its shareholders insofar as I have been able to ascertain, represent any interest adverse to the estate and are disinterested persons. I instructed BBLF staff to run a search through our conflicts and practice management software on the relevant parties in this case, including the Debtor, creditors, and other parties in interest, and to send a firm-wide e-mail regarding those parties to all the members of the firm for each individual attorney to ascertain any conflicts or connections and there were none other than the representation of Mary Kay McGuffin, disclosed above.

EXHIBIT "1"

7. Despite BBLF efforts to identify and disclose its connection with the Interested Parties in this case, BBLF is unable to state with absolute certainty that every client representation or other connection has been disclosed. In this regard, if BBLF discovers additional information that requires disclosure, BBLF will file a supplemental disclosure with the Court.

8. BBLF has not received any retainer from the Trustee for this representation.

9. Subject to the Court's approval, and in accordance with BBLF's agreement with the Trustee, BBLF intends to (a) charge for its legal services on a contingent fee basis, to be reimbursed solely from the bankruptcy estate *and only after court approval*, for its fees as detailed in the Application and attached engagement letter to the Application, and (b) seek reimbursement of actual and necessary out-of-pocket expenses solely from the bankruptcy estate and only after court approval, in connection with the rendering of legal services in accordance with BBLF's policies for all clients regarding this type of engagement. BBLF will maintain detailed, contemporaneous records of any actual and necessary services and expenses incurred in connection with the rendering of legal services described in the Application.

10. Other than the Trustee's agreement to compensate BBLF as described herein and to reimburse BBLF for reasonable and necessary expenses incurred on behalf of the Trustee, BBLF has not received any promises from the Trustee or any other person to compensate BBLF in connection with the case.

11. Other than the disclosed sharing of the contingent fees, if any are earned neither BBLF nor any member of BBLF have divided, paid over or shared, or agreed to divide, pay over or share, (a) any compensation it or they have received or may receive for services rendered or expenses incurred in connection with the case except as disclosed in the Disclosure of Compensation Under 11 U.S.C. § 329 AND BANKRUPTCY RULE 2016(b), with another party or

EXHIBIT "1"

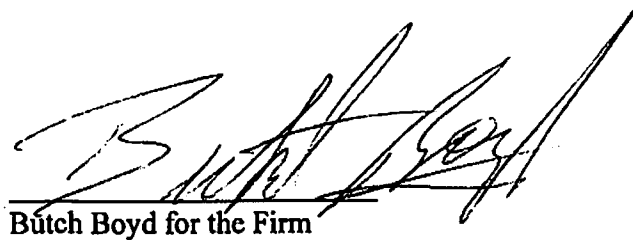
person (and except as among the partners of BBLF and Butch Boyd Law Firm, P.C. pursuant to the terms of the contingent fee agreement), or (b) any compensation that another party or person has received or may receive for services rendered or expenses incurred in connection with this representation.

12. BBLF and the professionals it employs are qualified to represent the Trustee in the matters for which BBLF is proposed to be retained as Special Counsel.

13. I believe that BBLF is eligible for employment and retention by the Trustee as counsel pursuant to the Bankruptcy Code and applicable Bankruptcy Rules.

14. I declare under penalty of perjury that the foregoing is true and correct."

Dated: March 1, 2024



Butch Boyd for the Firm